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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 EHREN BROSE,  
15 Defendant.

Case No. 3:23-cr-00017-MMD-CLB  
**ORDER APPROVING  
UNOPPOSED MOTION  
TO MODIFY CONDITIONS OF  
PRETRIAL RELEASE<sup>1</sup>**

16  
17 Ehren Brose hereby moves to modify the conditions of his release to allow him to go  
18 camping near Burney Falls, California on August 30–September 1, 2024. *See* 18 U.S.C.  
19 §§ 3142(c)(3), 3145(a)(2) (permitting modification of pretrial release conditions). U.S. Pretrial  
20 Services does not oppose this request. Nor does the government.<sup>2</sup>

21 Following his initial appearance, this Court released Mr. Brose on a personal  
22 recognizance bond. ECF No. 11. That bond subjects Mr. Brose to location monitoring and a  
23 curfew. *Id.* at 6. Mr. Brose has complied with those and all other conditions of release since  
24 beginning pretrial supervision on April 21, 2023.

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<sup>1</sup> This motion is timely filed, no deadline applicable.

<sup>2</sup> Given that the government does not oppose this motion, Mr. Brose believes it is  
suitable for resolution without a hearing.

1 While on pretrial supervision, Mr. Brose has also had multiple—and successful—  
2 temporary modifications of these conditions:

- 3 • In July 2023, Mr. Brose requested (and the Court granted) a  
4 modification temporarily removing those conditions to go camping with  
5 his immediate family at Frenchman Lake, California, in August 2023.  
6 *See* ECF Nos. 17, 18. His pretrial services officer reports that Mr. Brose  
7 had “no issues at all” with that travel.
- 8 • In January 2024, Mr. Brose requested (and the Court granted) a  
9 modification temporarily removing the same conditions to spend one  
10 night at the Peppermill Resort Hotel in Reno, Nevada, in connection  
11 with a work event for his wife. *See* ECF Nos. 22, 26. He similarly had  
12 no issues with that travel.
- 13 • In March 2024, Mr. Brose requested (and the Court granted) a  
14 modification temporarily modifying the same conditions to allow Mr.  
15 Brose to assist his father in driving a car down to Arizona. *See* ECF Nos.  
16 28, 29. He similarly had no issues with that travel.
- 17 • In June 2024, Mr. Brose requested (and the Court granted) a  
18 modification temporarily modifying the same conditions to allow Mr.  
19 Brose to attend his brother’s wedding. *See* ECF Nos. 33, 34. He  
20 similarly had no issues with that travel.
- 21 • In early July 2024, Mr. Brose requested (and the Court granted) a  
22 modification temporarily modifying the same conditions to allow Mr.  
23 Brose to engage in overnight work travel to Winnemucca and Lovelock.  
24 *See* ECF Nos. 35, 36. He similarly had no issues with that travel.
- 25 • In late July 2024, Mr. Brose requested (and the Court granted) a  
26 modification temporarily modifying the same conditions to allow Mr.  
Brose to go swimming near his home and camping in the Grass Valley  
area of California. *See* ECF Nos. 37, 38. He similarly had no issues with  
that travel.
- In mid-August 2024, Mr. Brose requested (and the Court granted) a  
modification temporarily modifying the same conditions to allow Mr.  
Brose to go camping near Sacramento, California. *See* ECF Nos. 39, 40.  
He similarly had no issues with that travel.

Mr. Brose now seeks to similarly modify the conditions of his pretrial release to permit  
him to go camping August 30–September 1. He hopes to spend quality summer time with his  
loved ones. Mr. Brose understands from his pretrial services officers that modification to his  
conditions of pretrial release is necessary to permit these activities given his bond’s location

1 monitoring and curfew condition. As a result, Mr. Brose is seeking Court approval to engage in  
2 such travel.

3 Should the Court grant his request, Mr. Brose also asks the Court to authorize his pretrial  
4 services officer to remove Mr. Brose's location-monitoring device in connection with this trip.  
5 See ECF Nos. 17, 18 (Mr. Brose making and the Court granting similar request); ECF Nos. 22,  
6 26 (same); ECF Nos. 33, 34 (same); ECF Nos. 37, 38 (same); ECF Nos. 39, 40 (same). Mr.  
7 Brose may be exposed to water while camping on August 30–September 1, and does not wish  
8 to damage his location-monitoring device's sensitive electronics while doing so. If the Court  
9 authorizes the device's temporary removal, Mr. Brose will coordinate with his pretrial services  
10 officer to remove the device a business day before the trip itself (August 29), and to re-place  
11 the device the business day following his return (September 2), or otherwise as soon as Pretrial  
12 Services is able.

13 This Court can "amend the [pretrial release] order to impose additional or different  
14 conditions of release" "at any time." 18 U.S.C. § 3142(c)(3). As a result, Mr. Brose asks this  
15 Court to:

- 16 1. modify his conditions of pretrial release to permit him to engage in the  
17 above camping; and
- 18 2. authorize the temporary removal of his location-monitoring device for  
19 the pendency of any such trip.

20 DATED this August 27, 2024.

21 By: /s/ Sean A. McClelland

22 SEAN A. MCCLELLAND  
23 Assistant Federal Public Defender

24 **IT IS SO ORDERED.**

25 **DATED** this 28th day of August, 2024.

26   
CRAIG S. DENNEY  
UNITED STATES MAGISTRATE JUDGE